REMARKS

Claims 1, 3-11, and 13-29 are currently pending in this application. Claims 1, 3, 5, 7, 11, 13, and 15-17 have been amended. Claims 2 and 12 have been cancelled, without prejudice. Applicant appreciates the Examiner's indication that claims 4, 14, 20, and 26 are directed to allowable subject matter.

Rejections under 35 U.S.C. § 102

Claims 1, 10, 11, 18, 19, and 23 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Application Publication No. 2002/0054090 to Silva. Claims 1 and 11 are the only independent claims subject to this rejection. Independent claim 1 has been amended to include the elements of dependent claim 2, and independent claim 11 has been amended to include the elements of dependent claim 12. The Examiner has admitted that the subject matter of now-cancelled claims 2 and 12 – which has been added to independent claims 1 and 11, respectively – is not anticipated by Silva. (*See* 12/15/2004 Office Action at pp. 5, 7.) Accordingly, the Section 102 rejection of amended claims 1, 11, and their respective dependent claims, should be withdrawn.

Rejections under 35 U.S.C. § 103

As stated above, the elements of dependent claim 2 have been added to independent claim 1, and the elements of dependent claim 12 have been added to independent claim 11. In the Office Action, dependent claims 2 and 12, as well as independent claim 24, were rejected under 35 U.S.C. § 103 as being obvious over Silva in view of U.S. Patent Application Publication No. 2002/0165955 to Johnson et al. The Examiner stated that:

> Silva does not disclose a method of partitioning the HTML document into a plurality of text sections and link sections. However, Johnson discloses a method in which an HTML document is partitioned into a plurality of text sections and link sections (Page 2, paragraphs 0028-0029 and Page 5,

paragraphs 0067-0069). As shown in the included definition of a java server pages it is well known to use JSPs for formatting dynamic web pages (definition of Java Server Pages from Free On-Line Dictionary of Computing). Thus, it would have been obvious to one of ordinary skill in the art at the time the invention was made to have used JSPs with the method of dynamically formatting web pages of Silva because it was well known in the art to use JSPs for dynamic formatting of HTML pages at the time the invention was made and it would have allowed for each section to be analyzed and processed under different standards.

Applicants respectfully traverse this rejection

First, even if combined, Silva and Johnson do not disclose each and every feature of independent claims 1, 11, and 24, as currently pending. Contrary to the Examiner's assertions, Johnson does not disclose or suggest a method in which an HTML document is *partitioned* into a plurality of text sections and link sections, as claimed. Rather, what Johnson discloses at page 2, paragraphs 0028-0029, and page 5, paragraphs 0067-0069 (the sections cited to by the Examiner) is a Web page that *contains* text sections and link sections. This is markedly different from the present invention, which includes a method of *partitioning* an existing HTML document into a plurality of text sections and link sections. Thus, no combination of Silva and Johnson discloses each and every feature of the pending independent claims. The Free On-Line Dictionary of Computing, mentioned by the Examiner, does not provide the missing disclosure.

Second, the prior art does not suggest the desirability of combining Silva and Johnson, as required under the patent laws. *See In re Mills*, 916 F.2d 680 (Fed. Cir. 1990)(The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.). Silva is directed to a method by which a user can create predetermined "web views" – personalized views of web pages containing abbreviated content – for later retrieval by devices having

limited bandwidth, such as wireless devices. In contrast, Johnson is directed to a tracking

system for web page content that allows someone to track the use of certain web pages (e.g.,

how users access the page, what links the users click on, what content the users access, etc.).

There is simply nothing in either of these references – or elsewhere in the prior art – that

suggests the desirability of combining the teachings of Silva and Johnson.

Finally, the Examiner has not pointed to any evidence of a reasonable expectation of

success in combining Silva and Johnson.
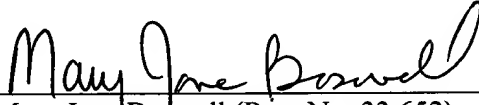
Conclusion

In view of the foregoing, Applicant respectfully requests reconsideration and the

timely allowance of pending claims 1, 3-11, and 13-29. Should the Examiner feel that there

are any issues outstanding after consideration of this response, the Examiner is invited to

contact Applicant's undersigned representative to expedite prosecution.

EXCEPT for issue fees payable under 37 C.F.R. § 1.18, the Director is hereby

authorized by this paper to charge any additional fees during the entire pendency of this

application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required,

including any required extension of time fees, or credit any overpayment to Deposit Account

50-0310. This paragraph is intended to be a CONSTRUCTIVE PETITION FOR

EXTENSION OF TIME in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

Date: June 15, 2005

By: _____
Mary Jane Boswell (Reg. No. 33,652)

Customer No. 009629
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 739-3000
Facsimile: (202) 739-3001